

Message

---

**From:** Beck, Nancy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=168ECB5184AC44DE95A913297F353745-BECK, NANCY]  
**Sent:** 3/22/2019 8:10:27 PM  
**To:** Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Baptist, Erik [Baptist.Erik@epa.gov]  
**Subject:** Fwd: TSCA NCC - Letter on EPA Practice for SNUR rulemakings and White Paper - Consideration of 'Nonrisk' Versus 'Risk' Factors Under Toxic Substances Control Act Section 5  
**Attachments:** 00258856.pdf; ATT00001.htm; 00252550.pdf; ATT00002.htm

\*\*\*\*\*

Nancy B. Beck, Ph.D., DABT  
Principal Deputy Assistant Administrator  
Office of Chemical Safety and Pollution Prevention  
P: [202-564-1273](tel:202-564-1273)  
[beck.nancy@epa.gov](mailto:beck.nancy@epa.gov)

Begin forwarded message:

**From:** "Kathleen M. Roberts" <[kroberts@lawbc.com](mailto:kroberts@lawbc.com)>  
**Date:** March 22, 2019 at 3:58:34 PM EDT  
**To:** "'Jeffery T. Morris, Ph.D.'" <[morris.jeff@epa.gov](mailto:morris.jeff@epa.gov)>  
**Cc:** "Lynn L. Bergeson" <[lbergeson@lawbc.com](mailto:lbergeson@lawbc.com)>, "'Nancy B. Beck, Ph.D.'" <[beck.nancy@epa.gov](mailto:beck.nancy@epa.gov)>, "'Alexandra Dunn, Esquire'" <[Dunn.alexandra@Epa.gov](mailto:Dunn.alexandra@Epa.gov)>  
**Subject:** TSCA NCC - Letter on EPA Practice for SNUR rulemakings and White Paper - Consideration of 'Nonrisk' Versus 'Risk' Factors Under Toxic Substances Control Act Section 5

Jeff:

Appended is a letter from the Toxic Substances Control Act (TSCA) New Chemicals Coalition (NCC) requesting a change in the current U.S. Environmental Protection Agency (EPA) practices regarding direct final rulemakings for Significant New Use Rule (SNUR) notices impacting multiple chemicals (document number 258856).

Also appended for your consideration is a white paper prepared by the TSCA NCC on the "Consideration of 'Nonrisk' Versus 'Risk' Factors Under Toxic Substances Control Act Section 5" (document number 252550).

If it would be helpful, we would be pleased to meet with you and your staff to discuss these documents further.

**KATHLEEN M. ROBERTS**  
**VICE PRESIDENT**  
**B & C CONSORTIA MANAGEMENT LLC**  
2200 Pennsylvania Avenue, N.W. Suite 100W | Washington, D.C. 20037  
T: 202-833-6581 | F: 202-557-3836 | [bc-cm.com](http://bc-cm.com)